

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**IN RE: METHYL TERTIARY BUTYL ETHER
PRODUCTS LIABILITY LITIGATION**
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**Master File C.A. No. 1:00-1898
MDL 1358 (SAS)
M21-88**

This document relates to the following cases:
City of New York v. Amerada Hess Corp., et al.,
04 Civ. 3417
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**NOTICE OF MOTION *IN LIMINE* OF LYONDELL CHEMICAL COMPANY TO
EXCLUDE ANY ARGUMENT OR EVIDENCE ATTRIBUTING THE ACTS OR
LIABILITY OF ATLANTIC RICHFIELD COMPANY TO
ARCO CHEMICAL COMPANY OR LYONDELL CHEMICAL COMPANY**

PLEASE TAKE NOTICE that on May 11, 2009, at the United States Courthouse at 500 Pearl Street, New York, New York, Lyondell Chemical Company ("Lyondell") hereby moves this Court for an Order excluding any argument or evidence at trial that attributes the acts or liability of Atlantic Richfield Company before June 9, 1987 to the Delaware corporation known as ARCO Chemical Company or Lyondell, or disregards the corporate separateness of Atlantic Richfield, on the one hand, and the Delaware corporation known as ARCO Chemical Company or Lyondell, on the other hand. In support of its Motion, Lyondell relies upon the accompanying Memorandum of Law, the Declaration of Joseph T. Lee, and all prior proceedings and pleadings.

Dated: May 11, 2009

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